



# Redis Employee Code of Business Conduct and Ethics

*Adopted on April 20, 2022*

This Employee Code of Business Conduct and Ethics (the "**Policy**") applies to all Redis employees regardless of employment agreement or rank, including members of the Board of Directors and officers (in connection with their work for the Company), as well as temporary employees, agency workers, contractors, and others working or providing services to or on Redis behalf (collectively "**Redis Personnel**" or "**Employee**"). Furthermore, this Policy provides guidelines for business conduct required of employees and contractors of Redis Ltd., Redis Inc., and Redis EMEA Ltd. or any of its affiliates ("**Redis**" or "**Company**") and outlines our expectations regarding behavior towards colleagues, supervisors, customers, vendors, and third parties. This Policy is subject to change and may be amended, supplemented, or superseded by one or more separate policies.

## **Professionalism and Integrity**

Redis expects that all personnel will show integrity and act with accordance to the highest standards of professional conduct, honesty, and ethical behavior. Redis Personnel should follow their schedules and perform their duties in the utmost professional way, be friendly, collaborative and be open for communication with colleagues, supervisors, or team members. While dealing with business interactions, you should act with respect towards clients and business associates. We expect supervisors and managers to not abuse their authority and all Redis Personnel not to abuse employment benefits such as time off, allowed expenses, insurance, facilities, subscriptions, or other benefits Redis offers. Finally, Redis Personnel should always maintain and develop knowledge and expertise in their professional field and seek to improve performance and skills quality. Remember, you are the face of the Company, thus your actions reflect on us and affect our reputation.

## **Compliance with Applicable Laws**

Redis takes its obligation to comply with all applicable laws very seriously and expects all Redis Personnel to act within the bounds of all applicable laws' requirements and prohibitions. Among the relevant legal areas are the followings:

### *Anti-Corruption, Bribery & Anti-Money Laundering*

Redis is committed to applying high standards and integrity to all business activities and partnerships. We do not seek advantage through unethical or illegal business practices and must comply with anti-bribery and anti-corruption laws of the countries in which we do business, including, but not limited to the U.S. Foreign Corrupt Practices Act, UK Bribery Act, and the Israel Penal Law. Redis also complies with and enforces applicable anti-money laundering requirements and obligations in the jurisdictions in which it conducts business. As a vendor to corporations and governments around the world, we apply this policy globally, which is further detailed in the [Redis Anti-Corruption and Economic Sanctions Compliance Policy](#).

### *Trade Controls*

Redis supplies its services and products internationally, and operates in a variety of countries, thus must also comply with all applicable international and local laws and regulations which apply to the import and export of goods and technical data, dealings and operations, including U.S. sanctions and embargoes, which restrict or, in some cases, prohibit companies, their subsidiaries and their employees from doing business with certain other countries identified by the U.S. government (for example, Crimea Region of Ukraine, Cuba, Iran, North Korea, Sudan and Syria) or specific companies or individuals. If you have any questions regarding export compliance, please contact our Office of Compliance Enforcement at [compliance@redis.com](mailto:compliance@redis.com).

### *Antitrust*

Redis excels by conducting business fairly and honestly, and by complying with applicable antitrust and competition laws which are designed to promote a free market. Such laws are comprised of



three main elements: (i) prohibiting agreements or practices that restrict free trade; (ii) prohibiting abusive use of market power; and, (iii) supervising mergers and acquisitions that are considered threatening to the competitive process. As Redis Personnel, you need to take those prohibitions into consideration and never, for example: share competitively sensitive information with competitors; agree with competitors about prices, collude on or engage in tender/bid rigging or manipulate the allocation of customers or markets; or enter a business engagement with the sole purpose of harming a competitor.

#### *Data Protection and Privacy*

Many countries and regions have implemented data protection laws and regulations to protect the personal information of their citizens. Since those laws usually apply to the individuals' personal information wherever located, Redis is under obligation to comply with a variety of data protection and privacy laws, thus it is critical that all Redis Personnel with access to information know and comply with all such laws. Everyone at Redis must act in compliance with the [Redis Employee Privacy Policy](#) and use care with respect to collection, receipt, use, storage disclosure and transmission of any personal information to ensure compliance with applicable privacy and data protection laws and regulations.

#### **Fair Sales and Marketing Practices**

We compete vigorously for business based solely on the merits of our products and services. We do not participate in any activities that unfairly harm competition. We want to win, but win fairly. We will accurately represent the Company and our products and services in our marketing, advertising and sales materials. We can promote our products and services and make comparisons between us and our competitors. Deliberately misleading messages, leaving out important facts or false claims about our products and services or competitors are inconsistent with our policies and may be illegal under applicable law. Antitrust laws govern relationships between a company and its competitors. Collusion among competitors is illegal and the consequences of a violation are severe. You must not enter into an agreement or understanding of any kind with competitors concerning prices, discounts or other terms or conditions of sale; profits or profit margins; costs; allocation of products, services, customers, markets or territories; boycotts of customers or suppliers; or bids or the intent to bid or even discuss or exchange information on these subjects.

#### **Respect for Human Rights & Commitment Against Slavery and Human Trafficking**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain, our partners, employees and contractors share our values. Suppliers and employees must uphold the human rights of workers, and to treat them with dignity and respect as understood by the local, national, and international principles, including, but not limited to the Trafficking Victims Protection Act and the UK Modern Slavery Act of 2015. Redis prohibits engaging in human trafficking, slavery, servitude, forced or compulsory labor, forced child labor and all other trafficking-related activities. Forced, bonded, or indentured labor or involuntary prison labor shall not be used under any circumstances. All workers will be voluntary, and workers should be free to leave upon reasonable notice. Workers must be compensated in a timely manner at pay rates that comply with applicable wage laws, including minimum wages and overtime.

As part of Redis' commitment to human rights, we look internally as well as externally for ways to address this concern. Internally, we provide annual training to Employees on this important topic and have in place systems to encourage the reporting of concerns and the protection of reporters and whistleblowers. Externally, we are building long-standing relationships with suppliers and service providers and make clear our expectations of business behavior in this regard. With regards to national or international supply chain, our point contact is preferably with a local company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

#### **SEC Reporting and Financial Reporting (Maintaining Accurate Books and Records)**

Complete and accurate financial statements and business records help us to make the best decisions and plans. We maintain proper records to run Redis successfully and lawfully, as they allow us to provide honest and up-to-date information to investors and government agencies. We maintain the integrity of our books and records by: complying with accepted accounting principles, internal controls, and laws; maintaining



honest, careful books, expense reports, and receipts of our financial transactions; record all assets, liabilities, revenues, expenses, and business transactions accurately; follow all recordkeeping procedures and guidelines; prohibit the creation or use of secret cash funds or other assets or liabilities; and promptly submit accurate records to internal and external auditors. If you are ever unsure about how to handle records, please contact [legal@redis.com](mailto:legal@redis.com).

*If you are not sure of something concerning laws and regulations, which may apply to your job and duties, you must contact your manager, the General Counsel at [legal@redis.com](mailto:legal@redis.com), or the Sr. Director of Compliance at [compliance@redis.com](mailto:compliance@redis.com), before acting.*

### **Conflict of Interests**

Redis Personnel must act in the best interest of Redis and avoid any possibility of conflict of interests. Conflict of interests occurs when competing interests or loyalties cause a person to pursue or act for his own personal interests, at the expense of the Company or its clients (personal interests include direct interests as well as those of family, friends, or organizations a person may be involved with or have an interest in).

Some examples of conflict of interests include, without limitation: (i) receiving or giving improper personal benefits or gifts from or to clients or partners, or in any way that might appear to have been given to influence a business decision; (ii) maintaining personal, business, or financial relationships with a client or vendor where you have control or influence over the Company's relationship with such client or vendor; (iii) being employed by or owning of a business (other than minimal stock ownership for investment purposes) that competes with Redis; (iv) using Company's assets for personal purposes; (v) selecting suppliers and persons seeking to do business with the Company, based on any considerations other than the best interests of the Company. If you have entered into a situation that may create a conflict of interest or may be deemed as such, you may submit a disclosure on the [Redis Employee Hotline](#) (a.k.a. Navex EthicsPoint, a third-party vendor) or contact the Office of Compliance Enforcement at [compliance@redis.com](mailto:compliance@redis.com) for guidance on how to report a potential conflict.

### **Harassment and Discrimination**

Redis is committed to creating a respectful work environment, free of harassment or discrimination of any kind. All Redis Personnel should respect their colleagues and not commit any conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment and at all times comply with Redis' policies for prevention of sexual harassment. Harassment can take many forms and it is the act itself and the impact on the individual, and not the intention that determines what constitutes harassment. Redis will not tolerate discrimination based on race, color, religious creed, national origin, gender, sexual orientation, age, disability, veteran status, marital status, or any other classification protected by applicable law, in decisions concerning recruitment, hiring, compensation, benefits, training, termination, promotions, or any other condition of employment or career development.

### **Protection of Company Property**

All Redis Personnel should treat Company's property, whether tangible or intangible, with respect and care, should not misuse Company equipment or use it frivolously. This also includes protecting Company facilities and other tangible property from damage and vandalism, whenever possible. Redis Personnel must comply with all obligations provided in their employment agreement(s) with the Company, including intellectual property rights associated with the protections of company property.

### **Intellectual Property**

Redis intellectual property is an invaluable asset and must be protected at all times. Intellectual property includes our trademarks, copyrights, patents, trade secrets, logos, domain names, and social media accounts. You should never allow a third party to use, or allow others to use, our trademarks or other intellectual property without proper authorization and a license agreement that has been approved by our Legal Department. Redis trademarks should never be used in a degrading, defamatory or otherwise offensive manner.



Redis intellectual property also includes work product. As Redis Personnel, any work you create, in whole or in part, in connection with your duties, and/or using company time, resources or information, belongs to Redis. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software, or any other materials you may help to create or author in connection with your work for our company belongs to Redis to the extent permitted by law.

### **Confidentiality**

Redis Personnel, as part of their job in the Company, might have access to information that Redis considers proprietary or confidential. Since most of Redis proprietary and confidential information is often subject to copyright, patent or other intellectual property or legal rights, and due to the importance of such information to the Company, Redis operates a very strict policy with regard to confidential information. You must strictly comply with all confidentiality obligations provided in your agreement(s) with the Company (with regard to Company's and third-party information) and follow Redis safeguards for protecting such information, during and after your engagement with the Company.

### **Reporting Concerns**

Redis promotes open and honest communication about actual or potential misconduct, without fear of retaliation. If you suspect a possible violation of this Policy, it is your responsibility to speak up and report it. Redis maintains the [Redis Employee Hotline](#) that is available to those who wish to ask questions about or report potential violations of this policy, other policies, regulations or laws. The hotline is available 24 hours a day via this website or by calling 1-866-833-3430 from the U.S. or Canada (global dialing numbers available on the website). Anonymous reporting is available through both the website and dialing options for the hotline. All concerns are taken seriously and retaliation against anyone who raises an allegation in good faith is strictly prohibited.

### **Non-Retaliation Statement**

We will not tolerate any retaliation against someone who reports actual or suspected violations in good faith. Any Employee who engages in retaliatory conduct will be disciplined, up to and including termination. In some cases, federal, state, and/or local law provides that retaliatory action for reporting unlawful activity is illegal. Employees who object to or refuse to participate in a policy, practice or activity that is unlawful, fraudulent, criminal or incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment are also protected from retaliatory action.

### **Enforcement and Compliance Authority**

Redis is authorized to enforce the use of and adherence to this Policy. Any suspected violation of our policies must be escalated to the General Counsel at [legal@redis.com](mailto:legal@redis.com), the Sr. Director of Compliance at [compliance@redis.com](mailto:compliance@redis.com), or the Chief People Officer.

Redis may take disciplinary action against any Personnel who violate this Policy or any Redis policies. Disciplinary actions will vary depending on the violation. Possible consequences may include demotion, reprimand, detraction of benefits for a definite or indefinite time, suspension, or up to termination of employment. Redis may take legal action in cases of unlawful behavior, or breach of any of the obligations provided herein.

### **Changes to this Policy**

Redis reserves the right in its sole discretion to modify this Policy.